

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

**TAJAE BRADLEY**, individually and as a )  
representative of the Class, )

**Case No. 2:22-cv-02525-MMB**

) **Plaintiff,** )

**v.** )

**CARVANA, LLC** )

) **Defendant.** )

**[PROPOSED] STIPULATED SCHEDULING ORDER**

Plaintiff Tajae Bradley (“Plaintiff”) and Defendant Carvana, LLC (“Carvana”), by and through their undersigned counsel, hereby jointly submit this [Proposed] Stipulated Scheduling Order and agree as follows:

WHEREAS, Plaintiff filed this action on or about June 3, 2022, in the Court of Common Pleas, Philadelphia County, Pennsylvania, under the caption *Bradley. v. Carvana, LLC*, Case ID 220600355 (ECF 1, Ex. 1);

WHEREAS, Plaintiff served Carvana with a copy of her Complaint on June 15, 2022 (ECF 1, Ex. 2);

WHEREAS, Carvana timely filed a notice of removal of this action from the Court of Common Pleas, Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania on June 28, 2022 (ECF 1);

WHEREAS, pursuant to Federal Rule of Civil Procedure 81, the current deadline for Carvana to file an answer or otherwise respond to the Complaint is seven (7) days after the date of removal, or July 5, 2022;

WHEREAS, pursuant to 28 U.S.C. § 1447, Plaintiff's deadline to file a motion to remand of this action on the basis of any defect other than lack of subject matter jurisdiction to the Court of Common Pleas, Philadelphia County, Pennsylvania is July 28, 2022;

WHEREAS, Carvana intends to file a motion to compel arbitration of the claims asserted in Plaintiff's Complaint on an individual, non-class basis and to dismiss or stay this action;

WHEREAS, Carvana is also evaluating whether to move to dismiss this action on other grounds;

WHEREAS, in the interests of facilitating the efficient resolution of the Parties' dispute, avoiding duplicative briefing, and conserving judicial resources, the Parties jointly propose the following schedule to the Court for its consideration of the potential and/or anticipated motions discussed above;

IT IS THEREFORE STIPULATED AND AGREED THAT:

1. The deadline for Carvana to move to compel arbitration on a non-class basis of the claims in Plaintiff's Complaint and/or answer or otherwise respond to Plaintiff's Complaint shall be set as thirty (30) days after the later of (i) the deadline for Plaintiff to move to remand this action on the basis of any defect other than lack of subject matter jurisdiction or (ii) the Court's issuance of a decision on a motion to remand, if one is filed.

Dated: July 1, 2022

Respectfully submitted,

/s/ Paul G. Gagne

Paul G. Gagne, one of the Attorneys for  
Carvana, LLC

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Dated: July 1, 2022

Respectfully submitted,

/s/ Kevin J. Abramowicz (with consent)

Kevin J. Abramowicz, one of the Attorneys for  
Plaintiff Tajae Bradley

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**IT IS SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
Hon. Michael M. Baylson  
United States District Judge